

SCHLANGER & SCHLANGER, LLP
ATTORNEYS AT LAW

9 EAST 40TH STREET, SUITE 1300
NEW YORK, NEW YORK 10016
TEL: 914-946-1981 FAX: 914-946-2930
PETER.LANE@SCHLANGERLEGAL.COM
WWW.NEWYORKCONSUMERPROTECTION.COM

MICHAEL SCHLANGER, ESQ.
DANIEL A. SCHLANGER, ESQ.
ELIZABETH SHOLLENBERGER, ESQ.
PETER T. LANE, ESQ.*
*ADMITTED IN NY & MA

WESTCHESTER OFFICE
343 MANVILLE ROAD
PLEASANTVILLE, NY 10570

October 24, 2014

VIA ECF

Chief Magistrate Judge Steven M. Gold
U.S. District Court, EDNY
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Freire v. NY Motor Group, et al, Case No. 13-CV-7291
Dong v. NY Motor Group, et al, Case No 14-CV-2980

Your Honor:

Our firm represents the Plaintiffs in the above-referenced related lawsuits brought against New York Motor Group, LLC, Planet Motor Cars, Inc., its owner and employees ("Dealership Defendants") and Santander Consumer USA, Inc. ("SCUSA"). As instructed in the Court's Order dated September 24, 2014, SCUSA and Plaintiff submit this joint settlement status report.

Counsel for those two parties are still in the process of finalizing all terms of the settlement. SCUSA and Plaintiff expect that they will be able to complete settlement within the next 30 days and file a stipulation of discontinuance as to SCUSA only, within 5 days thereafter. Accordingly, SCUSA and Plaintiff respectfully request that the Court allow us until November 24, 2014 to consummate settlement and file a discontinuance.

Respectfully,

/s/ Peter T. Lane
Peter T Lane, Esq.

cc: all counsel via ECF